

Affected Sources – Draft List for Discussion Purposes

Issue: Guidance is needed to better clarify what an “emissions from an affected source” is for the risk based compliance option being proposed for ch. NR 445, Wis. Adm. Code. The following list is intended to initiate discussion and is not intended to be an all encompassing list of affect sources under the rule.

Emissions of HAPs required to meet a control requirement option included in the compliance option	Emissions of HAPs required to meet a control requirement option not included in the compliance option
Direct stack	Resulting from periodic maintenance activities: Painting (exterior, railings, floors, etc.) Grounds (pesticides, fertilizers, etc.)
MACT sources	
Conveying operations	
Storage piles	
Group 1 and 2 Fossil Fuels	Resulting from the use of consumer products as they were intended to be used.
Indoor fugitive sources	Resulting from office activities (toner, adhesives, thinners, cleaning, etc.)
Outdoor fugitive sources (e.g., landspreading, lagoons)	External combustion Natural gas, total < 25 mmBTU Distillate oil, total < 10 mmBTU
Listed on MSDS (any quantified level)	Mobile sources
Gasoline dispensing	Indirect emissions as defined by s. NR 400.02(85)
	Remediation projects covered by other rules (e.g., asbestos)
	Fork lifts and other transportation activities
	Covered under research and testing exemptions (s. NR 406.04(i))
	Cigarette smoke
	Naturally occurring constituents in wind blown soil
	Laboratories (s. NR 400.02(90))
	Emergency generators (s. NR400.02(56))
	Malfunctions, upsets and spills
	When totaled have potential emissions of a HAP less than 5% of threshold level for that HAP